

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

IN RE: ETHICON, INC. PELVIC REPAIR  
SYSTEMS PRODUCTS LIABILITY  
LITIGATION

Master File No. 2:12-MD-02327  
MDL 2327

-----  
ETHICON NON-REVISION PTO 298  
(ELECTION WAVE) CASES LISTED IN  
EXHIBIT A

JOSEPH R. GOODWIN  
U.S. DISTRICT JUDGE

**NOTICE OF ADOPTION OF PRIOR DAUBERT MOTION OF  
OLGA RAMM, M.D. FOR NON-REVISION PTO 298 (ELECTION WAVE)**

Comes now, the Plaintiffs, and hereby adopt and incorporate by reference the Daubert motion, memorandum and reply brief filed in relation to Olga Ramm for Ethicon Wave 4, Dkt. 3614 (motion), Dkt. 3616 (memorandum in support) and Dkt. 3849 (reply). Plaintiffs respectfully request that the Court exclude Olga Ramm's testimony, for the reasons expressed in the Wave 4 briefing. This notice applies to the following Non-Revision PTO 298 (Election Wave) cases identified in Exhibit A attached hereto.

Dated: December 13, 2018

Respectfully submitted,

/s/ D. Renee Baggett

Renee Baggett, Esq.

Bryan F. Aylstock, Esq.

Aylstock, Witkin, Kreis and Overholtz, PLC

17 East Main Street, Suite 200

Pensacola, Florida 32563

(850) 202-1010

(850) 916-7449 (fax)

E-mail: [baylstock@awkolaw.com](mailto:baylstock@awkolaw.com)

/s/ Thomas P. Cartmell

THOMAS P. CARTMELL

Wagstaff & Cartmell LLP

4740 Grand Avenue, Suite 300

Kansas City, MO 64112

816-701-1102

Fax 816-531-2372

[tcartmell@wcllp.com](mailto:tcartmell@wcllp.com)

## EXHIBIT A

Barron, Bonnie	2:17-cv-03924
Bates, Doris	2:13-cv-16299
Bowman, Kristi Lynne	2:13-cv-17427
Brantley, Letha	2:13-cv-09479
Cuevas, Martha	2:13-cv-22564
Gomez, Carol	2:13-cv-04561
Harris, Donna	2:13-cv-32910
Harris, Sharon	2:12-cv-00947
Hollingsworth, Melanie W.	2:12-cv-03850
Howard, Kimberly	2:13-cv-32015
Markes, Esther	2:13-cv-12852
Martinez, Eloise	2:13-cv-32341
Salazar, Carol	2:16-cv-09048
Smith, Sharron	2:14-cv-08610
White, Leslie	2:16-cv-00280
Wulf, Jo-Ann	2:12-cv-03993

**CERTIFICATE OF SERVICE**

I hereby certify that on December 13, 2018, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

/s/ D. Renee Baggett  
D. RENEE BAGGETT  
Aylstock, Witkin, Kreis and Overholtz, PLC  
17 E. Main Street, Suite 200  
Pensacola, FL 32563  
850-202-1010  
850-916-7449  
[Rbaggett@awkolaw.com](mailto:Rbaggett@awkolaw.com)